

3	Certified copy of ZAIC policy No. BAP 9809603-04 issued to Silver Star Construction, effective dates 04/01/19-04/01/20	May be used
4	Petition filed in District Court of Payne County, OK CJ-20-233	May be used
5	Answer of ORD Trucking filed in District Court of Payne County, OK CJ-20-233	May be used
6	Answer of Defendant Israel Juarez filed in District Court of Payne County, OK CJ-20-233	May be used
7	Plaintiff's First Amended Petition filed in District Court of Payne County, OK CJ-20-233	May be used
8	Transcript of Deposition of Israel Juarez	May be used
9	Plaintiff's Second Amended Petition filed in District Court of Payne County, OK	May be used
10	Combined Answer of Israel Juarez to Plaintiff's Petition, Plaintiff's First Amended Petition, and Plaintiff's Second Amended Petition filed in District Court of Payne County, OK CJ-20-233	May be used
11	Defendant ORD Trucking's Answer to Plaintiff's Second Amended Petition filed in District Court of Payne County, OK CJ-20-233	May be used
12	Defendant Silver Star Construction Company's Answer to Plaintiff's Second Amended Petition filed in District Court of Payne County, OK CJ-20-233	May be used
13	Answer of Fredy N. Valle, Sr., d/b/a Valle Trucking to Plaintiff's Second Amended Petition filed in District Court of Payne County, OK CJ-20-233	May be used
14	Defendant Silver Star Construction Company's Answers to Plaintiff's First Set of Interrogatories	May be used
15	Defendant Silver Star Construction Company's Responses to Plaintiff's First Request for Admission	May be used

16	Defendant Silver Star Construction Company's Answers to Plaintiff's First Requests for Production	May be used
17	Defendant Fredy N. Valle, Sr., d/b/a Valle Trucking Responses to Plaintiff's First Set of Discovery Request	May be used
18	Defendant Silver Star Construction Company's Amended Answer to Plaintiff's Second Amended Petition and Cross-Claims against Defendant Fredy N. Valle, Sr., d/b/a Valle Trucking	May be used
19	Answer of Fredy N. Valle, Sr., d/b/a Valle Trucking to Cross-Claim of Silver Star Construction	May be used
20	Hauling Service Agreement between Valle Trucking and Silver Star Construction Company	May be used
21	Certificate of Liability Insurance, Berkshire Hathaway Homestate Ins. Co. to Fredy N. Valle, Sr. d/b/a Valle Trucking listing Silver Star Construction and its Subsidiaries as an additional insured	May be used
22	Certified copy of Great Lakes Insurance SE Policy No. GLG022472 issued to Valle Trucking, Inc. with effective dates of 2/11/19 to 2/11/20	May be used
23	Certificate of Liability Insurance, Great Lakes Insurance (SE) to Valle Trucking, LLC listing Silver Star Construction Company and its Subsidiaries as Certificate Holder	May be used
24	Certificate of Liability Insurance, Great Lakes Insurance (SE) to Valle Trucking, LLC listing Silver Star Construction Company and its Subsidiaries as Certificate Holder	May be used
25	Certificate of Liability Insurance, Progressive Northern Insurance Company to Fredy Valle, Valle Trucking listing Silver Star Construction and its Subsidiaries as Certificate Holder	Will be used
26	9/27/21 Letter from ZAIC to Fredy Valle demanding Valle Trucking defend and indemnify Silver Star Construction Company	May be used
27	11/15/21 Email from J. Chris Horton to Valletrucking51@yahoo.com re: attaching filings from underlying lawsuit and Demand from ZAIC to Valle Trucking	May be used

28	8/10/21 Plaintiff's Second Amended Petition filed in Payne County Oklahoma CJ-2020-233	Will be Used
29	5/20/21 Certificate of Service by Mail filed in Payne County Oklahoma CJ-2020-233	May be used
30	11/15/21 Letter from ZAIC to Fredy Valle re: demand that Valle Trucking defend and indemnify Silver Star Construction Company	May be used
31	5/17/22 Letter from ZAIC to Great Lakes Insurance SE demanding Great Lakes to defend and indemnify Silver Star Construction Company	May be used
32	5/17/22 Letter from ZAIC to Progressive Northern Insurance Company demanding Progressive to defend and indemnify Silver Star Construction Company	Will be used
33	5/17/22 Letter from ZAIC to Berkshire Hathaway Homestate Ins. Co. demanding Berkshire Hathaway to defend and indemnify Silver Star Construction Company	May be used
34	5/25/22 Letter from Chris Horton to Jeffrey Curran, counsel for Fredy Valle d/b/a Valle Trucking, re: demand that Valle Trucking defend and indemnify Silver Star Construction Company	May be used
35	6/20/22 Letter from Berkshire Hathaway to ZAIC re: declining to accept tender	May be used
36	8/9/22 Letter from International Programs Group to Silver Star Construction Company, Chris Horton, and ZAIC re: Notice of Reservation of Rights	Will be used
37	Correspondence from Progressive to Shelter Insurance dated 2/7/23	May be used
38	Correspondence from Silver Star's counsel to Progressive dated 9/19/22	May be used
39	Correspondence from Progressive to Valle Trucking dated 2/7/23	May be used
40	Correspondence from Progressive to Valle Trucking dated 2/8/23	May be used

41	4/4/22 Great Lakes' Notice of Reservation of Rights to Valle Trucking	May be used
42	5/25/22 Letter from J. Chris Horton to Jeffrey A. Curran re: demand for defense and indemnity of Silver Star in the litigation	May be used
43	11/15/21 Email from Chris Horton to Valle Trucking's Mr. Monge re: asking him to provide the lawsuit and ZAIC's letter to his insurance company.	May be used
44	2/8/19 Fax from Wanadaly Cruz, licensed insurance producer, to Great Lakes with Certificate of Insurance listing Berkshire as insurer	May be used
45	9/4/19 Official Oklahoma Traffic Collision Report	May be used
46	8/10/21 Summons to Silver Star with Plaintiff's Second Amended Petition	May be used
47	8/8/22 Notice of Reservation of Rights to Silver Star and Chris Horton from International Programs Group	May be used
48	2/10/22 Email from Kenneth A. Shaw at Richey Ins to j.f.thill@jplush.com	May be used
49	2/17/22 International Programs Group Letter to Valle Trucking re: reviewing the lawsuit and will advise regarding his request for defense and indemnity.	May be used
50	10/4/21 Letter from ZAIC to Fredy Valle re: demanding defense and indemnity by Valle for Silver Star	May be used
51	2/14/22 Email from John Thill to Terri Singleton re: the application we have shows the contact person as Freddy Napoleon Valle Arana and the phone number 405-501-8005. Includes 2/14/23 email from Terri Singleton to Mr. Shaw re: claim assigned to me for handling. Includes 2/11/22 email from j.f.thill@jplush.com to IPG Claims New Loss Notification,	May be used
52	2/11/22 Email from Jessica Christopher to Samantha Porbeck, IPG Claims New Loss Notification, and Terri Singleton re: Set up as 77889 Includes 2/11/22 email from Samantha Porbeck to IPG Claims New Loss Notification re: Please assign to Terri.	May be used

53	2/15/22 Email from Terri Singleton to newclaims@eandsclaims.com re: ZAIC is requesting defense for the lawsuit due to the Hauling Service Agreement.	May be used
54	7/29/21 Video Deposition of Israel Juarez	May be used
55	2/15/22-2/16/22 Claim notes of Great Lakes	May be used
56	All pleadings, motions, and orders filed in Payne County, Oklahoma District Court Case No. CJ-2020-233	May be used
57	All discovery exchanged in Payne County, Oklahoma District Court Case No. CJ-2020-233	May be used
58	All discovery exchanged in the instant action	May be used
59	Transcripts of all depositions taken in Payne County, Oklahoma District Court Case No. CJ-2020-233	May be used
60	Transcripts of all depositions taken in the instant action	May be used
61	Expert reports of all experts identified by any party to this action	May be used
62	Expert reports of all experts identified by any party in Payne County, Oklahoma District Court Case No. CJ-2020-233	May be used
63	Expert CVs of all experts identified by any party to this action	May be used
64	Expert CVs of all experts identified by any party in Payne County, Oklahoma District Court Case No. CJ-2020-233	May be used
65	Expert invoices for time spent by all experts identified by any party to this action	May be used

66	Expert invoices for all time spent by all experts identified by any party in Payne County, Oklahoma District Court Case No. CJ-2020-233	May be used
67	Expert prior testimony history for all experts identified by any party to this action	May be used
68	Expert prior testimony history for all experts identified by any party in Payne County, Oklahoma District Court Case No. CJ-2020-233	May be used
69	Expert publications for all experts identified by any party to this action	May be used
70	Expert publications for all experts identified by any party in Payne County, Oklahoma District Court Case No. CJ-2020-233	May be used
71	All documents exchanged by Progressive with its Initial Disclosures in this action unless otherwise objected to by Progressive	May be used
71	All documents exchanged by Great Lakes with its Initial Disclosures in this action unless otherwise objected to by Progressive	May be used
73	All documents exchanged by ZAIC with its Initial Disclosures in this action unless otherwise objected to by Progressive	May be used
74	All documents produced in response to Subpoenas in this action	May be used
75	All documents produced in response to Subpoenas in Payne County, Oklahoma District Court Case No. CJ-2020-233	May be used
76	All documents exchanged in discovery in Payne County, Oklahoma District Court Case No. CJ-2020-233	May be used
77	All documents exchanged in discovery in the instant action unless otherwise objected to by Progressive	May be used
78	All deposition exhibits of depositions taken in this action unless otherwise objected to by Progressive	May be used

79	All deposition exhibits of depositions taken in Payne County, Oklahoma District Court Case No. CJ-2020-233 unless otherwise objected to by Progressive	May be used
80	All verified discovery responses from this action unless otherwise objected to by Progressive	May be used
81	All verified discovery responses in Payne County, Oklahoma District Court Case No. CJ-2020-233 unless otherwise objected to by Progressive	May be used
82	Plaintiff's Answers to ZAIC's Interrogatories	May be used
83	Progressive's Answers to ZAIC's Interrogatories	May be used
84	ZAIC's Answers to Progressive's Interrogatories	May be Used
85	Plaintiff's Responses to ZAIC's Requests for Production	May be used
86	Progressive's Responses to ZAIC's Requests for Production	May be used
87	ZAIC's Responses to Progressive's Requests for Production	May be used
88	Progressive's Responses to ZAIC's Requests for Admission	May be used
89	ZAIC's Responses to Progressive's Requests for Admission	May be used
90	Exhibits identified in Great Lakes' responses to ZAIC's discovery requests.	May be used
91	Exhibits identified in Progressive's responses to ZAIC's discovery requests.	May be used

92	Exhibits identified in ZAIC's responses to Progressive's discovery requests.	May be used
93	Exhibits identified by ongoing discovery in this action.	May be used
94	Exhibits identified by ongoing discovery in the underlying action.	May be used
95	All exhibits listed by Plaintiff in this case not otherwise objected to by Progressive	May be used
96	All exhibits listed by ZAIC in this case not otherwise objected to by Progressive	May be used
97	Affidavits or other documents needed for the identification and authentication of records.	May be used
98	All materials considered or relied upon by experts in forming their opinions	May be used
99	All exhibits necessary for rebuttal or impeachment	May be used
100	Any exhibits identified as discovery progresses in this matter	May be used

Respectfully submitted,

STARR, BEGIN, & KING, PLLC

s/Bradley E. Bowlby

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CERTIFICATE OF SERVICE

I hereby certify that on September 19, 2023, I electronically transmitted the attached document to the Clerk of Court using the Electronic Case Filing System for filing. Based on the records currently on file in this case, the Clerk of Court will transmit a Notice of Electronic Filing to those registered participants of the ECF System.

s/Bradley E. Bowlby

